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January 8, 2016

BY EMAIL

Claire Hong
Remedial Project Manager
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Mail Code: ECL-122
Seattle, WA 98101

Re: Request for Information dated September 15, 2015 to
Frontier Communications Corp. Concerning the Quendall
Terminals Superfund Site, Renton, Washington

Dear Claire:

I am responding on behalf of Frontier Communications Corporation ("Frontier") to the U.S. Environmental Protection Agency's ("EPA") Request for Information addressed to Mr. Mark Nielsen dated September 15, 2015 ("Request for Information"). This letter, along with Exhibits A and B and the enclosed documents, constitutes the response of Frontier. Thank you for accommodating us with respect to the schedule for responding.

As you know, the Request for Information focuses primarily on any shipments from Honolulu Gas Company's former manufactured gas plant at 616 Iwilei Road, Honolulu, Hawaii ("Iwilei Gas Plant") to the Quendall Terminals Superfund Site ("the Quendall Terminals Site"). As described in the responses below, and shown in the attached documents, in 1997 Frontier, then known as Citizens Utilities Company ("Citizens"), purchased the outstanding stock of Gasco, Inc. ("Gasco") and merged Gasco into itself with Citizens being the surviving corporation. Frontier has been able to locate and provide herein documents relating to the acquisition of Gasco by Citizens. However, because the Iwilei Gas Plant was dismantled in the 1980s, and Citizens sold all the remaining Gasco operations in 2003, we believe there are no remaining historic records at Frontier and no Frontier personnel with personal knowledge of the historic Gasco operations.

Claire Hong
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After you have had an opportunity to review this response, I would welcome the opportunity to discuss any questions you have.

Sincerely yours,



John S. Hahn

Attachments

cc: Ted Yackulic

EXHIBIT A

RESPONSE TO REQUEST FOR INFORMATION

QUENDALL TERMINALS SUPERFUND SITE

Pursuant to § 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), Frontier Communications Corporation ("Frontier") respectfully submits the following responses to the Request for Information it received from the United States Environmental Protection Agency ("EPA") via letter dated September 15, 2015. These responses are made subject to the Objections set forth in Exhibit B. Responsive documents reviewed and relied upon in Frontier's response, excluding publicly available information (e.g., documents received from EPA), are included in the Appendix.

Respondent Information

1. Provide the full legal name and mailing address of the Respondent.

Response: This response is being submitted on behalf of Frontier Communications Corporation by its attorney:

**John S. Hahn, Partner
Mayer Brown LLP
1999 K Street N.W.
Washington D.C. 20006-1101
Phone (202) 263-3346; fax (202) 263-5346**

2. For each person answering these questions on behalf of Respondent, provide:
 - a. full name;
 - b. title;
 - c. business address; and
 - d. business telephone number and FAX machine number.

Response: Please see the response to Question 1.

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, and fax number.

Response: Please see the response to Question 1.

4. Describe in detail Respondent's relationship to the Honolulu Gas Company, incorporated in Hawai'i in 1904 and renamed as GasCo, Inc. in 1971. Provide all documents that relate to any corporate succession from Honolulu Gas Company and/or GasCo, Inc. and/or Pacific Resources, Inc. and/or Broken Hill Proprietary Company Limited and/or Citizens Utilities Company and/or Citizens Communications Company to Respondent, including,

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but not limited to, articles of incorporation, articles of merger, corporate name changes, purchase/sale agreements, and any relevant state or federal filings.

Response: Honolulu Gas Company, Limited ("Honolulu Gas") is believed to have been formed on August 2, 1904. As a result of a corporate reorganization that became effective in 1971, Gasco, Inc., a wholly-owned subsidiary of Pacific Resources, Inc. ("PRI"), apparently merged with Honolulu Gas, which was the surviving corporation and in turn changed its name to Gasco, Inc. In March 1989, The Broken Hill Proprietary Company, Limited ("BHP") reportedly acquired PRI, which became an indirect wholly-owned subsidiary of BHP. On October 31, 1997, BHP Hawaii, Inc., formerly known as PRI, sold to Citizens Utilities Company ("Citizens") all of the outstanding shares of capital stock of Gasco, Inc. Before that transaction, Gasco, Inc. sold by quit claim deed to BHP the site of the former gas plant at 616 Iwilei Road ("Iwilei Gas Plant"). On November 1, 1997, Gasco, Inc. was merged with and into Citizens, with Citizens being the surviving corporation and resulting in the formation of The Gas Company as an operating division of Citizens. Citizens is now known as Frontier Communications Corporation. In 2003, Citizens sold the assets of The Gas Company to the Hawaii Gas Company, LLC, which changed its name to The Gas Company, LLC.

Respondent Operations

5. State the dates during which Respondent or its predecessor owned and/or operated any portion of the manufactured gas plant located at 616 Iwilei Road in Honolulu, Hawai'i (referred to "former Honolulu Gas and/or GasCo site"). Provide the names of the companies that owned and/or operated at this location during the stated dates and their relationship to Respondent.

Response: Please see the response to Question 4. Answering further, Honolulu Gas is believed to have owned and operated the Iwilei Gas Plant from the time the plant began operations in 1904. Operations are believed to have ceased in the 1970s or 1980s, almost 20 years before Frontier acquired the stock of Gasco, Inc.

6. Identify any other facility owned and/or operated by Respondent or its predecessors that manufactured gas of any type or that were otherwise engaged in the gasification or refining of fossil fuel and that sent, transported, arranged for the transportation of, or otherwise transferred any materials, products, byproducts or wastes to the Quendall Terminals Site (including Republic Creosoting Company and the Reilly Tar and Chemical Corporation). For each facility identified, provide the name and address of the facility, identify the owner and operator of the facility at the time of transfer and its relationship to Respondent, and state the dates during which Respondent or its predecessor owned and/or operated any portion of the facility.

Response: Frontier is unaware of any other such facility having sent materials to the Quendall Terminals Site.

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7. The former Honolulu Gas and/or GasCo facility and any other facilities identified in response to question 6 will hereinafter be referred to as the "Listed Facilities." For the period between 1916 and 1971, identify and describe, and provide all documents that refer or relate to:
- a. All manufacturing or processing activities conducted at each of the Listed Facilities while it was owned or operated by Respondent or its predecessors. List the dates during which such activities were conducted and provide documents that describe the manufacturing or other processes including process diagrams, the constituents and chemicals in the produced products or generated waste, flow charts or other similar documents. This request is intended to include, but is not limited to, the following processes:
 - i. gasification processes producing tar, including but not limited to coal carbonization, oil-gas production, and carbureted water gas production;
 - ii. refining processes producing coal tar or tar residuals, including but not limited to the production of commercial products or byproducts; and
 - iii. reuse of coking byproducts and/or coal tar or tar residuals.
 - b. For each of the Listed Facilities, identify all materials used, reused, recycled, or produced from the activities identified in response to question 7(a). Your response should include a description of the handling and management of these materials, including how these materials changed over time or as a result of process changes. This request is intended to include, but is not limited to:
 - i. raw materials;
 - ii. byproducts;
 - iii. commercial products;
 - iv. debris and wastes; and
 - v. any hazardous substances not already identified.
 - c. For each of the Listed Facilities, identify and provide all documents related to materials, products, byproducts or wastes that were sold, transported, sent or otherwise transferred to the Quendall Terminals Site (including Republic Creosoting Company and the Reilly Tar and Chemical Corporation). The response should include, but is not limited to, all tests, analyses, analytical sampling, and any other data concerning the constituents, including hazardous substances, of such materials, products,

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byproducts or wastes. Please include information regarding who conducted the test and how the test was conducted (e.g. batch sampling, representative sampling, splits, composite, etc.).

- d. For each of the Listed Facilities, provide all contracts and/or agreements entered into by Respondent or its predecessors with persons or businesses that owned and/or operated the Quendall Terminals Site (including Republic Creosoting Company and the Reilly Tar and Chemical Corporation), or that shipped, transported, or otherwise transferred any materials, products, byproducts or wastes to the Site. Provide all pricing information including an explanation as to how the price was determined and when title transferred from Respondent or its predecessors to the third-parties. Also, provide all information concerning the purpose and intent of the contracts and/or agreements, including how the materials, products, byproducts or wastes were intended to be used to the Quendall Terminals Site.
- e. For each of the Listed Facilities, identify the dates and the methods by which materials, products, byproducts or wastes were shipped, transported, or otherwise transferred to the Quendall Terminals Site (including Republic Creosoting Company and the Reilly Tar and Chemical Corporation). This question is intended to include, but is not limited to, identification of carriers, mode of transport, and specifications for loading and unloading. Provide all documents related to such transport or transfers.
 - a. If the shipment of materials, products, byproducts or wastes to the Quendall Terminals Site from the Honolulu Gas and/or the GasCo facility were coincident to, or related to shipment of crude oil, or other materials, products, byproducts or wastes, returning to the Honolulu Gas and/or the GasCo facility, please identify.
- f. For each of the Listed Facilities, quantify the total amount of each of the materials, products, byproducts or wastes sent, transported, or otherwise transferred to the Site.
- g. The markings on and type, condition, and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal.
- h. From 1916-1971, all commercial products or byproducts sold or otherwise transferred to third-parties. Provide all information concerning the sale or transfer, including an explanation as to how the price was determined and when title transferred from the Respondent or its predecessors to the third-parties. The scope of this question does not include sales of manufactured gas to residential or commercial customers.

EXHIBIT A

- i. From 1916-1971, the disposition of all materials, products and byproducts not sold or transferred to third-parties as well as the disposition of debris and wastes identified in response to 7(b). Respondent's response should include a description of all recycling, reuse or disposal occurred. Respondent should also identify and provide dates for any changes in the recycling, reuse or disposal of materials, products, byproducts, residuals, debris or waste changed.

Response: Please see the responses to Questions 5 and 6. Answering further, the Iwilei Gas Plant is believed to have used the oil gasification process to manufacture gas. Frontier has not been able to locate any records bearing on EPA's assertion that Honolulu Gas and/or Gasco, Inc. shipped coal tar, water gas tar, or similar materials to the Quendall Terminals Site. If any tar-related material was shipped from the Iwilei Gas Plant to the Quendall Terminals Site, Frontier believes that such materials would have been sold for value as useful products, and certainly not sent as wastes intended for disposal.

8. Provide a description of, and all documents describing the factors considered by Respondent when deciding whether to sell or otherwise transfer materials, products, byproducts or wastes from each of the Listed Facilities to the Site. Specifically address whether the composition of the materials, products, byproducts or wastes was a factor, and if so describe and provide all documents related to such considerations, including any alteration, addition or other change in the characteristic or composition of such materials, products, byproducts or wastes material for the purpose of made by Respondent.

Response: Please see the response to Question 7. Answering further, Frontier is unaware of any Frontier documents responsive to this request.

9. If not already provided, for each of the Listed Facilities, provide all documents pertaining to sale, transfer, delivery or disposal of any materials, products, byproducts, or wastes sold or transferred to the Site. This request is intended to include, but is not limited to:
 - a. purchase orders;
 - b. price lists, pricing sheets and quotes;
 - c. carrier records and agreements;
 - d. transport designations, manifests and other records;
 - e. marketing and/or advertising materials concerning materials sold, transferred, delivered and disposed of; and
 - f. accounting records concerning product quantity, alternative buyers and uses for materials sold.

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Response: Please see the response to Question 7. Answering further, Frontier is unaware of any Frontier documents responsive to this request.

10. If not already provided, for each Listed Facility provide the names and contact information of any carriers or transporters of materials, products, byproducts or wastes to the Site.

Response: Please see the response to Question 7. Answering further, Frontier is unaware of any information responsive to this request.

11. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:
- a. the entity or entities that filed for bankruptcy;
 - b. the U.S. Bankruptcy Court in which the petition was filed;
 - c. the docket numbers of such petition;
 - d. the date the bankruptcy petition was filed;
 - e. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
 - f. a brief description of the current status of the petition.

Response: Neither Frontier nor to its knowledge any of its related entities have filed for bankruptcy.

12. If you have information concerning the course, content, or quantity of materials, products, byproducts, residuals, debris or wastes transported to or otherwise used at the facility that is not included in the information you have already provided, provide all such information.

Response: Please see the response to Question 7. Answering further, Frontier is unaware of any information responsive to this request.

13. Provide the names and last known address of any carriers or transporters of the materials, products, byproducts, residuals, debris or wastes identified in response to 7(b).

Response: Please see the response to Question 7. Answering further, Frontier is unaware of any information responsive to this request.

14. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous substances, at, or transportation of hazardous substances to or from, the Site.

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Response: Please see the response to Question 7. Answering further, Frontier is unaware of any information responsive to this request.

15. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous substances at, or transportation of hazardous substances to or from, the Site.

Response: Please see the response to Question 14.

Compliance with This Request

16. Describe all sources reviewed or consulted in responding to this Request, including, but not limited to:
- a. the name and current job title of all individuals consulted;
 - b. the location where all documents reviewed are currently kept.

Response: Frontier searched and reviewed its document management system for potentially responsive material based on file and directory names. Frontier also reviewed its files associated with Gasco, Inc., including the aforementioned acquisition in 1997 of Gasco, Inc. These files are maintained at Frontier's headquarters in Norwalk, Connecticut. The relevant documents located to date and used in this response are included in the Appendix. Frontier also consulted the following person in responding to this Request for Information:

John M. Greifzu, Jr.
Associate General Counsel
Frontier Communications

EXHIBIT B

FRONTIER COMMUNICATIONS CORPORATION'S OBJECTIONS TO REQUEST FOR INFORMATION QUENDALL TERMINALS SUPERFUND SITE

Pursuant to § 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), Frontier Communications Corp. ("Frontier") respectfully states the following objections to the Request for Information it received from the United States Environmental Protection Agency ("EPA") via letter from Shawn Blocker to Mark Nielsen dated September 15, 2015 (the "Request for Information"). Frontier provides its responses to the Request for Information subject to and without waiving any of the objections stated below.

OBJECTIONS TO INSTRUCTIONS

With respect to the Instructions provided in the Request for Information, and as such Instructions may apply to any or all of the Questions set forth in the Request for Information, Frontier makes the following objections. To the extent the Instructions purport to impose on Frontier a duty to seek information from, or to speculate about information available to, persons other than Frontier, Frontier objects that such instructions go beyond the scope of EPA's authority under § 104(e) or 42 U.S.C. § 9604(e). To the extent the Instructions purport to impose on Frontier a duty to obtain and produce copies of documents from persons other than Frontier or records that are available from publicly available sources, including without limitation regulatory agency files, Frontier objects that such Instructions go beyond the scope of EPA's authority. To the extent the Instructions purport to impose on Frontier a duty continually to supplement its responses to EPA's Request, Frontier objects that such Instructions go beyond the scope of EPA's authority. To the extent the Instructions purport to require Frontier to identify or produce information protected by attorney-client, work product or any other applicable privilege, Frontier objects to such Instructions as an improper violation of those privileges. To the extent the Instructions purport to require Frontier to respond to the Information Request regardless of Frontier's legitimate objections, Frontier objects to such Instructions as beyond the scope of EPA's authority. Frontier further objects to EPA's demand that the Respondent complete: i) a notarized certificate stating that the response is complete and contains all documents and information responsive to the request that are known following a complete and thorough review of all information and sources available (see Request for Information at 2); ii) a declaration certifying the accuracy of all statements in the response (see Instruction #10); and iii) a declaration that the response is complete, true, and correct (see Enclosure 2 of Request for Information at 12). Frontier is not aware of any legal authority for requiring such a declaration and/or certification of responses submitted pursuant to § 104(e) of CERCLA.

OBJECTIONS TO DEFINITIONS

With respect to the Definitions provided in EPA's Request for Information, and as such Definitions may be used in any or all of the Questions set forth in the Request for Information, Frontier makes the following objections. Frontier objects to the definition of "waste" or "wastes" to the extent it uses vague and ambiguous terms such as "trash, garbage, refuse,

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byproducts,” and “solid waste.” Frontier further objects to the Request for Information to the extent certain requests contain vague or ambiguous terms that are not defined by the Definitions provided in EPA’s Request for Information. Those undefined terms include, without limitation, “coal tar wastes,” “water gas tar,” “relationship,” “gasification,” “refining,” and “processing activities.”

GENERAL OBJECTIONS

Frontier objects to the pending Request for Information as exceeding the scope of the Agency’s statutory authority. Frontier further objects to the pending Request for Information to the extent the individual requests are overly broad and unduly burdensome. Frontier offers its responses without admitting liability and without waiving any of its objections or defenses to this or other Information Requests. Frontier reserves the right to assert additional objections to the Requests as appropriate and to supplement its objections and responses.

SPECIFIC OBJECTIONS

Frontier objects to Question 11 because it seeks information and documents for subsidiaries unrelated to this matter, is overly broad and unduly burdensome, and exceeds the scope of the Agency’s statutory authority. Frontier objects to Questions 14 and 15 to the extent that they purport to seek information and records from other companies and parties beyond the control of Frontier and without regard to those companies’ relationship with Frontier.